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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

# Amendment to Part 61 of the Commission's Rules Requiring Metric Conversion of Tariff Publications and Supporting Information

CC Docket No. 93-55

BellSouth Telecommunications, Inc. ("BellSouth") hereby submits its comments in response to the Notice of Proposed Rulemaking issued in the above referenced proceeding.<sup>1</sup> In the Notice the Commission proposes to amend Part 61 of its rules by requiring carriers subject to tariff filing requirements to file tariffs and supporting documentation that incorporate metric units of measurements. The amendment is intended to advance the goal of the Metric Conversion Act of 1975 which declared it a national policy that the metric system of measurement be employed wherever possible.<sup>2</sup>

Although BellSouth understands the Commission's desire to encourage metric conversion, BellSouth believes

1       Amendment of Part 61 of the Commission's Rules  
Requiring Metric Conversion of Tariff Publications and  
Supporting Information, CC Docket No. 93-55, FCC 93-134,  
Notice of Proposed Rulemaking, released April 8, 1993  
("Notice").

2 Id.

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that adoption of the proposed rule, particularly at this time, will create unnecessary customer confusion and will place additional administration burdens on customers and carriers alike. However, if the Commission determines it to be in the public interest to go forward with this rulemaking, BellSouth urges the Commission to adopt its proposal to let carriers select one of the three options set forth in the Notice. BellSouth believes that such an approach would be the only means by which to balance the Commission's goal in going forward with metric conversion with the need to minimize customer confusion and avoid unnecessary administrative burdens.<sup>3</sup>

#### DISCUSSION

The Metric Conversion Act ("The Act") established the metric system of measurement as the preferred system of weights and measures for United States trade and commerce.<sup>4</sup> The Act requires that certain Federal Agencies, not including the FCC, use the metric system in their business related activities to the extent feasible by September

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<sup>3</sup> If the Commission determines that multiple options are not feasible, then BellSouth urges the Commission to adopt the first option.

<sup>4</sup> Metric Conversion Act of 1975. Pub. L. 94-168, 89 Stat. 1007 (1975), as amended by Pub. L. 100-418, 102 Stat. 1107 (1988).

1992.<sup>5</sup> In the Notice, the Commission proposes to amend Part 61 of its rules by requiring carriers to choose one of three options in order to advance the goals of the Act. The first option would require a carrier to provide in the general rules section of a tariff publication, a table for converting non-metric units and corresponding rates into metric units. This option does not require that a metric unit or corresponding rate appear in the tariff or supporting information. The second option would allow the carrier to state in the applicable rate section of the tariff publication and in supporting information, the metric unit and corresponding rate in parenthesis beside the non-metric unit and rate. The third option would require a carrier to provide in its tariff a conversion table for converting non-metric units and corresponding rates into metric units and rates. Only the resulting metric unit and rate would be required to be shown in the tariff publication and in all supporting information.<sup>6</sup>

BellSouth understands the Commission's intent in promoting the goals of the Metric Conversion Act whenever practical. However, the extensive changes in Commission rules and policies which are currently affecting

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<sup>5</sup> Id.

<sup>6</sup> Notice at 3.

telecommunications carriers and customers alike call into question the efficacy of introducing the metric system at this time.

The Commission is currently involved in implementing the most massive changes in the way local exchange carriers (LECs) and their customers do business since divestiture of the Bell System. Implementation of expanded interconnection and the complete restructure of switched local transport are changes of extraordinary scope and magnitude. These changes alone will require a significant amount of effort on the parts of customers to understand and LECs to implement. Another overlay of unnecessary change, such as converting rate measures to metric units, will be of no benefit to customers or LECs.

The potential detrimental effects that metric conversion can generate are easily illustrated. For instance, with the implementation of expanded interconnection and BellSouth's rate zone plan, there will be a significant increase in the number of distance-sensitive rate elements. Currently, the rates shown for special access services are regional rates. With the introduction of rate zone pricing, each distance-sensitive rate element may have a different rate for each zone in each of BellSouth's nine states. As a result, rate zone pricing will add about two hundred forty pages to the high capacity

section of BellSouth's Tariff F.C.C. No. 1. Having parallel non-metric and metric rates as suggested in option two of the Notice would have the effect of increasing the high capacity portion of the special access section by an additional ninety pages. This will create an additional administrative burden on both LECs and their customers that will only increase as other services are converted to rate zone pricing.

From a carrier billing systems standpoint both of the

converted, there is a potential for error.<sup>7</sup> If LECs must maintain a dual billing system for both metric and non-

If the Commission nonetheless decides to proceed with some form of metric conversion, BellSouth urges the Commission to adopt its proposal which would give carriers a choice as to which option they will employ in order to satisfy their obligations under the rules. BellSouth believes this proposal would balance the desire of the Commission to incorporate the metric system of measurement into its rules while at the same time minimizing customer confusion and the administrative burdens placed on carriers and their customers.<sup>9</sup>

Further, if the Commission proceeds, it is BellSouth's belief that the two year compliance period will not give carriers enough time to routinely revise their tariffs. Thus, at the end of the two year period, carriers would likely be forced to flood the Commission with special filings converting those tariffs that had not been revised over the two year period. BellSouth believes that a five year period is a more reasonable and realistic amount of time in which to comply with the proposed rule.

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<sup>9</sup> Alternatively, if the Commission were to mandate the options to be employed by all carriers, BellSouth urges the Commission to adopt the first option.

For the reasons stated above, BellSouth does not believe that the metric conversion of tariff filings is in the public interest at this time. If the Commission must proceed with this rulemaking, BellSouth urges the Commission to allow carriers to select among the three options to satisfy the requirements of the rule and that the new rules be phased in over a five year period.

Respectfully submitted,

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